

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
Western DIVISION

**FILED**

JAN 03 2017

  
CLERK

Clayton G. Walker  
5442 Madison Dr.  
Black Hawk SD 57718  
(Enter the full name of the Plaintiff[s] in this action)

Case No. 17-5001  
(To be assigned by  
Clerk of District Court)

vs.

① Chris Varcoe official  
② Chris Varcoe Individual  
③ Federal officials  
④ United States  
⑤ unknown named agents  
(Enter the full name of ALL Defendant[s] in this  
action. Fed. R. Civ. P. 10(a) requires that the  
caption of the complaint include the names of all  
the parties. Merely listing one party and "et al." is  
insufficient. Please attach additional sheets if  
necessary.)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitution provisions, if you know them. Fed. R. Civ. P. 8(a)(1) requires a short and plain statement of the grounds for the court's jurisdiction.):

Bivens action, Implied causes of Action,  
Federal government  
Article III of the Constitution - requires courts to hear  
actual cases, plaintiff alleges & can prove injured  
party & walker suffered Damages from varcoe &  
unknown agents for BHFTF the Damages are protected  
by Federal Constitution. Chris Varcoe enter the  
residence without a search warrant a constitutional law.  
The claim is over 100,000 walker is a resident of  
Pennington Co. The Injury happen on the soil  
of the United States. Areas of jurisdiction apply to  
federal laws.

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A violation of federal law is tried in federal Courts.  
Terri Lark - Western Division

DSD 12-12

II. Plaintiff, Clayton Walker resides at

5445 medallion Dr  
(street address)

Black Hawk, \_\_\_\_\_,  
(city) (county)

SD, 57718, N/A  
(state) (zip) (telephone number)

(If more than one plaintiff, provide the same information for each plaintiff below)

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III. Defendant, Chris Varcoe <sup>officials</sup> resides at, or its business is located at

300 Kansas City St.  
(street address)

Rapid City, \_\_\_\_\_,  
(city) (county)

SD, 57701, \_\_\_\_\_  
(state) (zip) (telephone number)

(If more than one defendant, provide the same information for each defendant below)

Chris Varcoe Individual  
Federal officials  
United States  
unknown named agents

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- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

on or about the 10<sup>th</sup> day of September 2014, Chris Varcoe & unknown agents enter walkers resident without a warrant violating walkers constitutional Rights. They slammed my head into the police van causing injury. Breached a duty of care to the plaintiff walkers 4 & 14. Constitution Amendments were violated, walker suffered head injury. They failed to provide walker with the same Rights & Federal Rights as other people.

They Breached a duty of care owed to the victim.

Statute of limitations.

\* Walker has no law degree and the Statute of limitations will be over by the time walker gets his law degree. Walker ask the Court to lift blindfold to see that walker isn't an Attorney yet & should overlook small Reconstruction Amendments July 9 1968

Errors.

Police Brutality.

- V. Relief (State briefly and exactly what you want the Court to do for you.)

walker prays for relief, walker prays for a Discovery, a trial, Violation of the 4 & 14 Amendments to be explained to the Department, walker is entitled to relief under Bivens Claim FTCA, walker wants 100,000 for attorney Damages, physical damages.

- \* Bivens vs. 6 unknown agents.
- \* 4 14 Constitutional Amendment.
- \* Evaluating each officer on Knowledge of
- \* Bivens Claim for US Constitution amendments 1, 4, 5, 6, 8

- \* ask to Court to help with police Brutality problem in South Dakota
- \* Whose Fourth Amendment freedom from unreasonable searches & seizures

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason[s] you believe you are entitled to recover such monetary damages:

120,000 is the amount we seek for damages  
& violation of Civil Rights 1, 4, 5, 6 & 8  
Constitutional Amendments

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☐

NO ☒

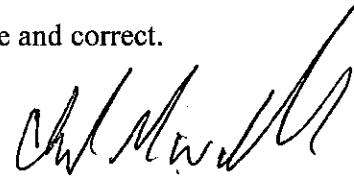
VIII. Are you requesting a Jury Trial?

YES ☒

NO ☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3 day of January, 2017



5445 mediation Dr

Black Hawk SD 57718

Signature of Plaintiff[s]